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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**NORTHWEST ENVIRONMENTAL
ADVOCATES,**

Plaintiff,

v.

**UNITED STATES FISH AND
WILDLIFE SERVICE and UNITED
STATES ENVIRONMENTAL
PROTECTION AGENCY,**

Defendants.

Case No. 3:18-CV-01420-AC

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S
MOTION TO COMPLETE AND
SUPPLEMENT THE U.S. FISH AND
WILDLIFE SERVICE'S
ADMINISTRATIVE RECORD**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendants the United States Fish and Wildlife Service ("FWS") and United States Environmental Protection Agency ("EPA") (collectively "Defendants"), through undersigned counsel, hereby move for an extension of time for Defendants to file their response in opposition to Plaintiff's Motion To Complete and

Supplement the U.S. Fish and Wildlife Service's Administrative Record, ECF 20. Plaintiff filed its motion on May 31, 2019. By operation of LR 7-1(e)(1) Defendants' response is presently due June 14, 2019. Defendants respectfully request to extend the deadline to file a response brief to July 3, 2019.

Defendants request this extension to accommodate the calendars of undersigned counsel as well as the calendars of the agency counsel and program staff of Defendants. Several personnel with knowledge of the scientific literature proffered in Plaintiff's Motion have previously scheduled absences from the office and other conflicts with the schedule of litigation counsel. Those scheduling conflicts and lack of availability of key personnel have delayed and slowed Defendants' preparation of an appropriately detailed response to Plaintiff's Motion, including points regarding each of the 22 extra-record documents proffered by Plaintiff.

Defendants were unable to confer over a feasible briefing schedule for Plaintiff's motion until after the motion was filed. Counsel for Plaintiff has authorized undersigned counsel to state that Plaintiff consents to this motion. Thus, granting this motion will not prejudice any party.

For the foregoing reasons, Defendants respectfully request an extension of time to July 3, 2019 for Defendants to file their response to the Motion to Complete and Supplement the U.S. Fish and Wildlife Service's Administrative Record.

Respectfully submitted this 10th day of June, 2019,

JEAN E. WILLIAMS
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/s/ John H. Martin
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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2019, a true and correct copy of the above document was electronically filed with the Clerk of Court using CM/ECF. Copies of the document will be served upon interested counsel via the Notices of Electronic Filing that are generated by CM/ECF.

/s/ John H. Martin
JOHN H. MARTIN